

REED SMITH LLP
A limited liability partnership formed in the State of Delaware

John P. Bovich (SBN 150688)
Email: jbovich@reedsmith.com
Douglas H. Riegelhuth (SBN 166686)
Email: driegelhuth@reedsmith.com
REED SMITH LLP
Two Embarcadero Center, Suite 2000
San Francisco, CA 94111-3922

Mailing Address:
P.O. Box 7936
San Francisco, CA 94120-7936
Telephone: 415 543 8700
Facsimile: 415 391 8269

DOUGLAS W. HALL (*Pro Hac Vice Application Pending*)
Email: dhall@fordharrison.com
Ford & Harrison LLP
1300 Nineteenth Street, N.W., Suite 700
Washington, DC 20036
Telephone: 202.719.2065
Facsimile: 202.719.2077

Attorneys for Defendant
SKYWEST AIRLINES, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SKYWEST PILOTS ALPA ORGANIZING
COMMITTEE, et al.,

Plaintiffs,

vs.

SKYWEST AIRLINES, INC.,

Defendant.

No.: 3:07-CV-02688-CRB

**DECLARATION OF DOUGLAS W. HALL
IN SUPPORT OF MOTION TO DISSOLVE
TEMPORARY RESTRAINING ORDER**

Honorable Charles R. Breyer

Date: To be determined
Time: To be determined
Place: Courtroom 8, 19th Floor
Compl. Filed: May 22, 2007

1 I, DOUGLAS W. HALL, declare:

2
3 1. I am an attorney at law licensed to practice before the courts of the District of
4 Columbia. I am an attorney with the law firm of Ford & Harrison LLP, attorneys of record for
5 SkyWest Airlines, Inc. ("SkyWest"), Defendant in the above-referenced action. My *pro hac vice*
6 application before this Court is pending. I make this Declaration in support of SkyWest's Request to
7 Shorten Time. I have personal knowledge of the matters set forth in this Declaration. If called as a
8 witness, I could and would competently testify to these matters.

9 2. Plaintiffs have demanded that SkyWest immediately comply with certain
10 aspects of the TRO – including access to SkyWest's email system by noon today and the
11 establishment of dedicated bulletin boards throughout SkyWest's system by 5:00 p.m. "local time"
12 today. These demands were made in a May 22, 2007 letter from Linda Lye, counsel for Plaintiffs.
13 A true and correct copy of the May 22, 2007 is attached hereto as Exhibit A.

14 I declare under penalty of perjury under the laws of the United States of America that
15 the foregoing is true and correct.

16
17 DATED: May 23, 2007.

18
19
20 /s/
DOUGLAS W. HALL

CERTIFICATION

I hereby attest that I have on file all holograph signatures for any signatures indicated by a "conformed" signature (/S/) within this efiled document.

DATED: May 23, 2007

REED SMITH LLP

By: /s/ John P. Bovich
John P. Bovich
Attorneys for Defendant

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EXHIBIT A

ALTSHULER BERZON LLP

ATTORNEYS AT LAW

177 POST STREET, SUITE 300

SAN FRANCISCO, CALIFORNIA 94108

(415) 421-7151

FAX (415) 362-8064

www.altshulerberzon.com

STUART C. NAIFEH
FELLOW

FRED H. ALTSHULER
STEPHEN P. BERZON
EVE H. CERVANTEZ
BARBARA J. CHISHOLM
JEFFREY B. DEMAINE
REBEKAH B. EVENSON
JAMES M. FINBERG
EILEEN B. GOLDSMITH
LAURA P. JURAN
SCOTT A. KRONLAND
PETER E. LECKMAN
DANIELLE E. LEONARD
STACEY M. LEYTON
LINDA LYE
PETER D. NUSSBAUM
KATHERINE M. POLLOCK
CLAIRE P. PRESTEL
DANIEL T. PURTELL
MICHAEL RUBIN
PEDER J. THOREEN
JONATHAN WEISSGLASS

May 22, 2007

By electronic mail, facsimile, and United States mail

Mr. Doug Hall
Ford & Harrison LLP
1300 19th Street, NW, Suite 700
Washington, DC 20036

Mr. Todd Emerson, General Counsel
Ms. Patricia Stambelos, Assistant General Counsel
SkyWest Airlines, Inc.
444 South River Road
St. George, Utah 84790

Re: *SkyWest Pilots ALPA Organizing Committee v. SkyWest Airlines, Inc.*
07-CV-02688 CRB

Dear Counsel,

As you are aware, the Court today issued a temporary restraining order against SkyWest Airlines, Inc. in the above-referenced matter. I emailed you a copy of the TRO earlier today, and have also served you with a copy by overnight delivery, which will arrive tomorrow morning. The TRO requires SkyWest immediately to cease and desist from interfering with the right of pilots employed by SkyWest to engage in expressive and associational activity protected by the Railway Labor Act ("RLA" or "the Act") and from discriminating against pilots with respect to their expressive and associational activity.

We of course expect SkyWest's immediate compliance with all of the terms of the TRO. We write specifically to address the implementation of the portion of paragraph 3 the TRO

Mr. Hall, Mr. Emerson, Ms. Stambelos
May 22, 2007
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requiring SkyWest "to provide Plaintiffs and their members with access to the same channels of communication provided to SAPA at any point during the last year, including but not limited to a dedicated bulletin board in each crew lounge where SAPA had a dedicated bulletin board at any point in the last year, general bulletin boards in crew lounges, pilot mailboxes, SkyWest's email system, and newly-hired pilot classes."

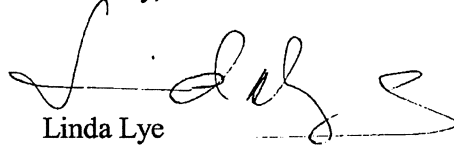
First, we understand that a training session for newly-hired pilots is scheduled to begin on Monday, May 28, 2007. Pursuant to the terms of the TRO, Plaintiffs will be sending a representative to the training session and expect that our representative will be given time to speak to the class of newly-hired pilots regarding ALPA, the organizing campaign, and the benefits of ALPA representation. SkyWest has routinely allowed SAPA to make hour-long presentations to classes of newly-hired pilots. We request that, to comply with the TRO, SkyWest place the SkyWest Pilots ALPA Organizing Committee, on the training session agenda for one hour on Tuesday, May 29, 2007.

Second, the TRO requires SkyWest to provide Plaintiffs and their members with access to SkyWest's email system to communicate with the pilot group. Please provide us no later than noon PDT on Wednesday, May 23, 2007 with all of the information and access we will need to be able to distribute information to the pilot group through the "SkyWest online" system.

Third, the TRO requires SkyWest to provide a dedicated bulletin board in each crew lounge where SAPA had a dedicated bulletin board at any point in the last year. Please provide us with a list of each such location, and ensure that a bulletin board dedicated for use by the SkyWest Pilots ALPA Organizing Committee is posted in each of these locations no later than 5 pm local time.

Please get back to me by noon PDT on Wednesday, May 23, 2007, confirming that all of these matters will be addressed, as required by the TRO.

Sincerely,

A handwritten signature in black ink, appearing to read "L. Lye", with a long horizontal line extending to the right.

Linda Lye
Attorney for Plaintiffs